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Operational Standards

A.1 Communication Assistants (CAs)

CA Employment Standards

WATRS contracts with Sprint to provide the hiring, training and oversight of Communication Assistants (CA) for WATRS. Sprint has established a successful procedure to attract qualified applicants for TRS CA positions.

The first step in the CA's hiring practice is a validated test that screens for typing, language skills, and other skills related to the CA position. When an applicant passes the test, a Human Resources representative screens the applicant over the phone or in person, for oral communication skills and work availability. If the applicant passes this step, he/she is interviewed in person by an Operations Supervisor for specific job dimensions that relate to the success of a

CA. If the supervisor recommends the applicant for employment, the applicant undergoes a drug screen and security/reference check. This process ensures that only qualified applicants are hired to work at a relay center.

Sprint IP (Internet Relay) CAs follow the same employment and training standards as TRS CAs. In addition, Sprint provides an enhanced VCO service called Captioned Telephone (*CapTel*) Services. Sprint requires that all *CapTel*/CAs have a high school graduate equivalency as a minimum qualification for the position.

All Sprint Video Relay (VRS) Interpreters are qualified and adhere to the Registry of Interpreters for the Deaf (RID) Code of Professional Conduct. For more information about VRS interpreter qualifications and training expectations, see Appendix B.

Communication Assistant Training Program

Sprint trainers use adult learning theories; training is adapted to each participant's learning modality, incorporating lecture, visual graphics, flow charts, videos, role playing, and hands-on-call training, to stimulate the CA's ability to learn.

New hires receive training in Deaf Culture, ASL translation, the needs of non-signing deaf individuals, and sensitivity to the needs of persons with hearing and speech disabilities by a qualified person who, if not deaf or hard of hearing, possesses extensive knowledge in this area. During the CA's initial training, they are trained and evaluated on how to accurately reflect the TTY user's communication and on the CA's role in the relay process. CAs' performance-based skills, such as grammar, spelling and oral communication abilities are evaluated. Sprint works closely with local deaf and hard of hearing communities to identify knowledgeable presenters to assist with the training. Sprint utilizes videos, role-playing, group activities and discussion groups to educate employees on the different needs of their customers to ensure sensitivity towards customers.

Additionally, applicants are given written and hands-on evaluations to demonstrate their ability to spell and type accurately, process a call using live training terminals, and role-play in varying levels of ASL. CAs also receive extensive training on how to improve their interpersonal skills so that they can work effectively with difficult and stressful situations that may arise during their employment. These training mandates and skill



expectations also apply to Sprint IP CAs and VRS interpreters where appropriate. Please review the Sprint TRS, Speech to Speech (STS), CapTel and Video Relay Service (VRS) Training outlines in Appendix B. A team of ASL-fluent Sprint employees developed the ASL Training workbooks that are utilized by CAs for ongoing training. These workbooks have been designed to provide supplemental training and to assist CAs toward the mastery of ASL translation on relay calls.

Captioning Assistants Training Program

CapTel CA training includes comprehensive training on the *CapTel* Service Workstation equipment and other instruction including some live call handling experience. All prospective CAs are required to meet all of the *CapTel, Inc.* (CTI) standards for becoming a production CA. These standards include the ability to consistently meet call handling skills such as WPM averages, accuracy averages, as well as attendance and attitude standards, as set by CTI management. At any time, if a prospective CA does not demonstrate the ability to achieve the expected standards, they may be removed from the training group and terminated from employment. See Appendix B.

All *CapTel* CAs are tested for competency in typing, grammar, and spelling to ensure skills meet the FCC Guidelines. *CapTel* CA training provides familiarity with hearing, deaf, and Speech-Disabled cultures. A captioned telephone user does not type while making a call, therefore there is never an opportunity for the CA to have to interpret typewritten ASL.

CapTel CAs must follow certain guidelines while supporting calls. Below is a list of these guidelines.

- 1.1 The CA shall be trained to caption the words spoken by the hearing party as accurately as reasonably possible, without intervening in the communications. The CA is permitted to provide background noise identification.
- 1.2 The CA shall not maintain any records of conversation content and shall keep the existence and content of all calls confidential.
- 1.3 The CA shall be required to meet the FCC standards for TRS minimum transcription speed.
- 1.4 The CA shall not limit the length of a call and shall stay with the call for a minimum of ten minutes when answering and placing a call.
- 1.5 The CA shall pass along a *CapTel* caller's Automatic Number Identification (ANI) to the local Public Service Answering Point (PSAP) if the caller disconnects before being connected to emergency services.
- 1.6 Personnel supporting *CapTel* will have the requisite experience, expertise, skills, knowledge and training and education to perform *CapTel* Services in a professional manner.

Please review the Sprint TRS, STS, *CapTel* and Video Relay Service (VRS) Training outlines in Appendix B for more information on CA training requirements.



CA Quality Assurance Programs

Monthly Surveys

Sprint Relay conducts monthly surveys and formal reviews to monitor and evaluate the continuing training for Sprint Relay TRS CAs as well as Sprint IP CAs. The survey process used is a product of a task force comprised of management staff. It evaluates all areas of work performance, personal effectiveness and attendance. The survey process goals are to respond to customer feedback and provide the CA with clearly defined and objective performance measures. Two surveys are completed on each CA every month and include areas such as Typing Accuracy, Spelling, Conversational English/ASL Translation, Clarity/Enunciation, Caller Control, and Etiquette/Composure.

Quality Assurance Test Calls

To ensure that all CAs are focused on FCC requirements and state contractual commitments, Sprint Centers and/or an independent third party quality testing firm are retained by Sprint to perform a total of 700 test calls. Results are provided on a quarterly basis to the WATRS Program Manager. Feedback and appropriate guiding performance measures for specific components are addressed with each CA. Sprint Relay also conducts test calls to ensure *CapTel* quality at least once a quarter. However, Sprint often conducts 100 test calls per month on *CapTel*.

Relay Program Management and Trainer Test Calls

Additionally, the Operations department and members of the Relay Program Management Team identify areas of concern based on customer feedback, state feedback, individual survey results and customer contacts. Approximately 300 test calls per month are conducted focusing on the identified monthly call-processing topic. Results are compiled and shared with Operations' management. Based on the results, the trainers and management determine if refresher training is required and what method will be used for delivery.

Transmission of 60 WPM

All Sprint Relay CAs type a minimum of 60 words per minute (WPM). Sprint Relay utilizes an oral-to-type test that simulates actual working conditions. CAs are tested on an ongoing basis to ensure that a 60 WPM performance requirement is maintained. During this test, Sprint Relay does not use technology-aided transmission to ensure the typing speed. The scores for each CA are the actual words per minute that are typed. The most recent test results were an overall 82.5 WPM with 97% accuracy for all call Centers. This applies to Sprint IP and IP wireless relay CAs as well.

Sprint Relay utilizes technological aids during relaying such as pre-programmed macros and auto-correcting software, along with the CA's natural skill, to provide optimal service.

CapTel's voice recognition technology enables oral to text transmission at rates above 100 WPM. While oral to type tests are waived as a result of this technology, oral to text tests are given to all *CapTel* CAs.



Qualified VRS interpreters

All Sprint Video Relay Service (VRS) Interpreters are qualified and adhere to the Registry of Interpreters for the Deaf (RID) Code of Professional Conduct. For more information about VRS interpreter qualifications and training expectations, see Appendix B.

In-Call Replacement of CAs

WATRS requires all CAs to stay on the call for a minimum of 10 minutes, with the exception of Speech to Speech (STS) CAs, who must stay on the call for a minimum of 15 minutes. This is included in the CA training matrix under Appendix B, Module 4I. Sprint requires all Sprint IP and IP Wireless CAs, and VRS Interpreters, also known as Video Interpreters (VIs) to also stay on the call for 10 minutes. CapTel CAs also stay on all calls for a minimum of 10 minutes. See also Appendix I, Sprint Policy on 10 and 15 minute rule.

When a WATRS relay user requests a CA of the opposite gender of the CA who initially received the call, the relay user is switched to an appropriate CA as soon as one becomes available. If a change of CA is necessary during the call, every attempt will be made to accommodate the previous gender request. When a Sprint VRS and Sprint IP or IP Wireless user requests a specific gender, every attempt will be made to honor the request. If a change of VIs is necessary during the call, every attempt will be made to accommodate the previous gender request.

WATRS CapTel CAs are waived from this requirement. See Appendix J, FCC *CapTel*/Mandatory Minimum Standards & Compliance Matrix.

WATRS CAs transmit and relay all conversations between the caller and the called parties in real time.

Real Time Call Transmission

CapTel is a transparent service. CAs transmit audio and captioned text conversations to the *CapTel* user in real time. Since the *CapTel* user utilizes their own voice to transmit, no transmission occurs from the CA to the voice caller.

A.2 Confidentiality and Conversation Context

Confidentiality Policies and Procedures

As stated earlier, WATRS contracts with Sprint Relay to oversee all TRS CAs, including *CapTel* CAs for the State of Washington. Sprint Relay believes that measures to ensure confidentiality are crucial to the success of TRS, Sprint IP/IP Wireless and VRS operations and has implemented procedural and environmental measures to safeguard customer and call information.

In accordance with the FCC regulations, all information provided for the call set-up, including customer database records, remain confidential and cannot be used for any other purpose. Once the inbound party disconnects, CAs and video interpreters (VI) lose the ability to view or access any information pertaining to that call. No written or taped information regarding the call is kept once the call is released from the Relay position. Billing information is transferred to billing files after the call has been terminated and is no longer available except for billing purposes.



The only exception to this policy relates to STS calls. WATRS STS Relay Agents may retain information from one inbound call for use in a subsequent outbound call, with the caller's permission. Such information will only be retained for the duration of the inbound call.

WATRS' confidentiality expectations are strictly enforced and employees are expected to comply with this policy during and after their period of employment. Sprint strictly enforces confidentiality policies in the Relay Center, which include the following:

- Prospective CAs and VIs undergo a thorough background investigation and screening.
- During initial training, CAs and VIs are presented with examples of potential breaches of confidentiality.
- Stress can be a factor in maintaining confidentiality. CAs and VIs receive training on healthy detachment.
- Breach of confidentiality will result in disciplinary action up to and including termination of employment.
- CAs perform their work in cubicles that are bordered by high sound-absorption acoustic tiles and wear special noise reducing headsets.
- All Sprint Relay Centers have security key access.
- Visitors are not allowed in Relay work areas.
- Supervisors are present in the work area to observe behavior.
- All Relay Center personnel are required to sign and abide by the Sprint Relay Center's Agreement Regarding Confidential Customer Information.
- All employees attend annual confidentiality meetings wherein the confidentiality agreement is reviewed and re-signed.

Sprint Relay Center's Agreement Regarding Confidential Customer Information requires CAs and VIs to:

- Keep all call information confidential.
- Not edit or omit any content from the conversation.
- Not add or interject anything into the content or spirit of the conversation.
- Assure maximum user control.
- Continuously improve their skills.

Please refer to Appendix C for the TRS Pledge of Confidentiality. This document is similar to what is used for Sprint VRS interpreters and Sprint IP and Sprint IP Wireless CAs.

WATRS *CapTel* Captioners must comply with the same rules that TRS follows regarding confidentiality. The *CapTel* confidentiality form is similar to TRS. Below is an explanation of confidentiality as it pertains to *CapTel* Captioners. A copy of the *CapTel* confidentiality form signed by *CapTel* CAs can be found under Appendix C.

Information obtained during a *CapTel* call should not be shared with any person except a member of the *CapTel* management staff who has asked for specific information. This information may be needed to clarify technical, policy, emergency, venting, consumer, or customer service issues. General call information will not be shared unless it is used to clarify, vent, or teach. Information about call content should be discussed in a private area only.



Only information critical to resolving the situation will be disclosed. This may include consumer name, name of business/agency, gender of caller, type of call (voice in, *CapTel*/in), day of week, time of day, city, state, or any other details that could, in some way, identify a consumer.

A Captionist may have problems, complaints or stress from handling the call. The Captionist may ask to speak to a supervisor or other member of management in a private area.

The success of *CapTel* depends on quality and complete confidentiality. Since consumers will be less likely to use the service if they feel their personal and professional calls are not kept in the strictest confidence, all Captionists understand and abide by the confidentiality policy. Any Captionist who breaks this policy will be disciplined, up to and including termination.

STS Limited Exception of Retention of Information

At the request of a caller, WATRS Speech-to-Speech (STS) CAs will retain information from a call in order to facilitate the completion of consecutive calls. No information is kept after the inbound call is released from the CA position.

Verbatim Relay and the Translation of ASL

WATRS CAs type to the TTY user or verbalize to the non-TTY user exactly what is said, verbatim, starting when the call is first answered, and at all times during the conversation, unless either the Relay user specifically requests summarization or ASL interpretation.

At the request of the Relay user, WATRS CAs will translate written ASL into conversational English. All WATRS CAs are able to translate the typed languages of Relay users whose primary language may be ASL or whose written English language skills are limited to conversational grammatically correct English. Training is provided on various levels of English/ASL during the initial training, as well as throughout a CAs employment. In order to finish training successfully, the CA must demonstrate competent skills to translate the calls as requested.

Sprint VRS interpreters, Sprint IP/IP Wireless CAs and WATRS *CapTel* CAs are prohibited from intentionally altering a relayed conversation and will relay all conversation verbatim.

STS Facilitation of Communication

WATRS STS CAs receive training on how to facilitate STS communication without interfering with the independence of the user. STS CAs are evaluated monthly on their ability to facilitate the call without altering content of the conversation or compromising the user's control. WATRS Relay users have full control of all of their Relay calls.



A.3 Types of Calls

Sprint Relay Services

WATRS provides 24 hour, 7 day-a-week Telecommunication Relay Service (TRS) for standard (voice), Text Telephone (TTY), wireless, or personal computers (PC) users to place local, intrastate, interstate, and international calls. WATRS also processes calls to directory assistance and to toll free numbers. There are no restrictions on the duration or number of calls placed by any Relay user. All Relay users accessing WATRS retain full control of the length and number of calls placed anytime through Relay. Sprint IP/IP Wireless CAs and VRS interpreters are also prohibited from refusing single or sequential calls or limiting the length of calls using Relay services.

WATRS *CapTel* CAs are currently waived for outbound calls because the *CapTel*/CA is not involved in the call set up and cannot refuse the call. *CapTel*/users dial sequential calls directly therefore it is not possible for a *CapTel*/CA to refuse sequential calls or limit length of calls.

WATRS *CapTel* CAs are not waived by the FCC for inbound calls to a *CapTel* user made through a TRS facility. However, if a call is made directly to the captioned telephone access number, no set up is involved and the *CapTel*/CA cannot refuse to call. Please see Appendix K for more information on these waivers. WATRS, through Sprint Relay, works in conjunction with the Local Exchange Enhanced Services to provide additional functionality for users of TRS. Sprint processes collect and person-to-person calls and calls charged to a third-party as well as calls billed to prepaid and non-proprietary calling cards offered by the local or any other interexchange carrier. WATRS will also process calls to or from restricted lines e.g. hotel rooms and pay telephones.

When a TRS or *CapTel* call is placed through WATRS, the user will be billed in the same manner that a non-Relay user would be billed. The Relay user will only be billed for conversation time, (which does not include call setup time, time in between calls and wrap-up time) on toll calls. Billing will occur within 60 days of the call date. WATRS gives users the option of billing their calls to non-proprietary LEC (local) or IXC (long distance) calling cards. WATRS will process calling cards offered by the user's carrier of choice if the carrier is a participant of Sprint's Carrier of Choice (COC) program and as long as Feature Group D is at the Carrier's access tandem. WATRS works with the LECs and IXCs to compile and make available to all TTY or *CapTel* users a list of acceptable calling cards. The user's carrier of choice is responsible for providing call types and available billing options, and will also handle the rating and invoicing of toll calls placed through the Relay.

WATRS provides access to all available Relay call types. A complete list of all call types provided by WATRS may be found in Appendix H, Sprint TRS Standard Call Features Matrix. Most call types are waived by the FCC for IP and VRS users. Please refer to the Sprint VRS and IP Report to the FCC, Appendix L.

Except where waived by the FCC, WATRS *CapTel* users are able to access all types of TRS calls. The requirement to provide 711 dialing is waived for inbound calls made from a *CapTel* phone. STS and HCO calls are also waived from 711 dialing requirements.



Call Release Functionality

The WATRS TTY to TTY Call Release Functionality allows the CA to connect two TTY users and then drop off the line, leaving the two TTY customers connected. This is especially useful for customers needing to use a pre-paid calling card, reach another TTY user through a switchboard or operator, or when needing to speak with a voice user first. With 2-Line *CapTel* service, a *CapTel* user can release or receive captions at any time during a call.

Frequently Dialed Numbers

WATRS Frequently Dialed Numbers, sometimes referred to as Speed Dial Numbers, allow Relay users to store up to 10 frequently called numbers in their customer preference database along with a name for each entry. When initiating a call the user can provide the name to the WATRS CAs, instead of the entire 10-digit number. The *CapTel* Consumer Premises Equipment (CPE, or *CapTel* phone) is equipped with the ability to program in 3 speed dial numbers, and a recently dialed number.

Three-Way Calling

WATRS Customers who have purchased three-way calling from their Local Exchange Carrier (LEC) can use the feature when placing a call through Relay. This feature allows a customer to add a third party to a TRS call. For example, a TTY caller places a call to the Relay and then bridges another TTY person on his or her line. The original TTY caller then requests to place a call to a voice user. The CA will make the connection and Relay the call between the voice party and both TTY users. This process would also apply if there were two voice customers and one TTY user on the line.

WATRS *CapTel* users are also able to participate in a three way call. Although the person using the captioned phone is unable to establish the three-way call, the called party will be able to do so by utilizing the telephone switch hook (or "flash") button on his or her CPE. Thus, WATRS *CapTel* meets the requirement for three-way calling for users of One-Line *CapTel*. For Two-Line *CapTel*, either party can initiate a three-way call should the user purchased this as an LEC option. WATRS *CapTel* users are also able to participate in a conference bridge to speak to three or more individuals.

When a Relay caller reaches an answering machine, voice mail or interactive menu, the CA informs the Relay caller by hitting a macro which reads (ANS MACH) or (RECORDING) to keep the caller informed of the call progress. The CA then, if necessary, presses a hot key to record the voice announcement and relay the message back to the caller. The CA utilizes WATRS's recording technology to obtain all information necessary on the first attempt. The CA relays all of the recorded information to the customer and deletes the recorded message. This technology greatly reduces the CA work time, as the CA does not need to make multiple outdials. In addition, WATRS Relay callers are only charged for the first call. Subsequent redials to leave a message or enter information into an interactive menu are not charged to the customers. WATRS has developed a procedure using our Ultra Wide Area telephone Service (WATS) lines to ensure that, with additional out-dials, the customer does not incur toll charges.

Callers to WATRS access 900 services by dialing a free 900 number to access Relay. Use of a toll-free 900 number inbound to the Relay Center provides functionally equivalent access to the telecommunications network while preventing unauthorized end users from circumnavigating the LEC restrictions. This process ensures that the LEC will only complete those calls into the Relay service that do not have a 900 number



block added to their phone lines. The 900 service provider and the 900 number carrier(s) will rate and bill the user as if the call was dialed directly from the originating user's telephone. Currently, WATRS users may make 900 calls through 1-900-646-3323.

WATRS, Sprint IP and Sprint IP Wireless and VRS VIs provide both answering machine and voice mail retrieval options. Please refer to Appendix H, Sprint TRS Standard Call Features Matrix.

Answering Machine

WATRS CAs will inform Relay users when reaching an answering machine, voice mail or interactive menu. The CA will hit a "hot key" which reads (ANS MACH) or (RECORDING) to keep the caller informed of the call progress.

When reaching a recorded message, the CA utilizes WATRS's recording technology to obtain all information necessary on the first attempt. The CA can then play back the recording at a pace that allows them to relay the entire message to the caller, after which the recorded message is deleted. This technology greatly reduces the CA's work time and accordingly, time billed to the State.

The CA will type the entire outgoing message verbatim including the option for the Relay user to leave a message, if applicable.

The CA will leave the Relay user's message in the appropriate mode of communication. WATRS has the capability to leave messages in voice, text and data devices.

Once the CA has left the message on the answering machine or voice mail, the CA will send a pre-programmed response to the Relay caller stating:

(UR MSG LEFT) CA XXXXM/F GA

Subsequent redials to leave a message or enter information into an interactive menu are not charged to the customers. WATRS through Sprint Relay has developed a procedure using our Ultra WATS lines to ensure that, with additional outdials to leave a message, the customer does not incur toll charges. Customers will only be charged for the first call. WATRS CapTel CAs are also equipped with the ability to retrieve messages stored on the CapTel user's answering machine(s).

Voicemail Retrieval

WATRS has the capability to retrieve messages from answering machines by placing an outbound call to a remote location or to the same location as the caller. When a user requests to retrieve messages from the caller's location, the CA will instruct the user when to take the handset off the hook and when to begin playing back the messages. The CA will retrieve all messages and relay verbatim. The recorded message will be automatically deleted by the system once the Relay call is completed. WATRS CapTel CAs are also equipped with the ability to retrieve messages stored on the CapTel user's answering machine(s). The WATRS *CapTel* users are able to hear and interact directly with the recorded message and makes the selections as requested by the interactive menu. The *CapTel* user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played.



WATRS *CapTel* users can request that the CA replay messages as often as required until the message is both heard and read as captions. The *CapTel* user interacts with the recorded message system directly. This is treated as one call.

A.4 Handling of Emergency Calls

Relay users will be encouraged to dial 911 as their primary means of contacting Emergency Services. However, if a Relay user makes an emergency call through WATRS, the CA will make every effort to correctly route the call to an appropriate PSAP based on the network and user-provided information.

WATRS meets the requirements of emergency calls by immediately routing 911 calls to either the ~~an~~ appropriate Public Service Answering Point (PSAP) that the caller would have reached by dialing 911 directly, or a PSAP that is capable of dispatching emergency services in an expeditious manner. With one CA keystroke, WATRS's intelligent CA application utilizes the Numbering Plan Area (NPA/NXX) information of the inbound caller to immediately cross-reference this information to a national database containing the ten-digit emergency number with the appropriate PSAP in Washington. Within seconds, this number is entered in the dial window and the call is then immediately initiated.

WATRS considers an emergency call to be one in which the user of the Relay Service indicates they need the police, fire department, paramedics or ambulance. WATRS utilizes a standard E911 database that serves all of the United States and has uniform procedures, as noted below, which are followed at every Sprint Relay Center.

- The CA, when told by a TTY/ASCII user (non-voice) that an emergency exists, will hit a "hot key".
- The CA terminal sends a query to the E911 database containing the callers geographic area Automatic Number Identification (ANI).
- The E911 database responds with the telephone number of the PSAP that covers the geographic source of the call, and then automatically dials the PSAP number and automatically passes the caller's ANI to the E911 Service Center.
- The CA remains on the line until emergency personnel arrive on the scene unless previously released by the caller. The CA also verbally passes the caller's ANI onto the E911 Center operator. If the inbound Relay caller disconnects prior to reaching E911, the CA will stay on the line to verbally provide the caller's ANI to the E911 Center operator.

WATRS and Sprint recognize that, in some emergencies, valuable time could be lost if the TTY call were to be transferred to the PSAP, and the results could be life threatening. Therefore, the CA will assist, as necessary, to maintain connectivity between the PSAP and the caller. The WATRS CA will remain on the line to provide assistance to facilitate communication for all emergency calls and will not disconnect until the call has been completed.

Connections to 911 services are currently waived for IP and VRS providers. Sprint strongly encourages Internet Relay users to dial 911 directly to receive prompt emergency services via TTY or standard voice phone.

Sprint IP via its website permits manual 911 processing. If a user tells the CA to dial 911, the CA will request supervisor assistance. The user will need to provide the address and city where he/she is calling from. The Supervisor will call Directory Assistance (on a separate phone call) to obtain a 10-digit



emergency PSAP number. Then the supervisor will pass it to the CA to make an outbound call to the 911 dispatcher (PSAP). It can take a few minutes or so to get the information. WATRS users are encouraged to enter a 10-digit emergency number on the website for more efficient call processing.

More information about Sprint's procedure for handling E911 calls, including *CapTel* calls, may be found in Appendix D.

A.5 STS Called Numbers

The WATRS customer database is available to Speech-to-Speech (STS) users. The database can be used to store a list of names, frequently dialed telephone numbers, and customer notes. The database automatically appears on the CA's terminal screen each time a user connects with WATRS. The customer database helps to facilitate call set-up and conversation preferences for the STS user. Customer profile information contained in the WATRS Customer Database will be transferred to any new provider at the end of the contract term.

Technical Standards

B.1 ASCII and Baudot

Each WATRS CA position is capable of receiving and transmitting in voice, Baudot, including TurboCode™ and E-TurboCode™, as well as ASCII codes. When a call is received by the CA, TTY signals are automatically identified as either Baudot or ASCII; if ASCII, the baud rate is detected. ASCII rates up to and including 19,200 bps are supported by the Sprint platform. The domestic TTY baud rate of 45.5 and the international rate of 50 baud are also supported. Intelligent modems allow the CA to handle either voice or data lines from the same CA work station. This automatic identification of call types for incoming calls provides a quick and efficient technique for varied customer input and reduces the average CA work time to a minimum.

Sprint IP currently provides services via ASCII connection. Currently, ASCII and Baudot requirements are waived for *CapTel* services. For more information about *CapTel* waivers, see Appendix K.

B.2 Speed of Answer

As the WATRS vendor since April 1998, Sprint has developed the capability to effectively manage a human resource pool that provides unsurpassed quality. Sprint has grown their TRS Operations capability to handle approximately 27 million calls per year. Sprint has gained valuable experience in sizing its TRS Operations to accommodate contract requirements. Historical call detail is gathered by 15-minute periods throughout the years of providing TRS service. This historical information is combined with state-specific information to establish anticipated call patterns that accurately predict the personnel needs necessary to efficiently process the Relay calls.

Sprint meets the requirement of answering 85% of all calls within 10 seconds on a daily basis by a live CA. (Abandoned calls are included in this 85/10 Service Level calculation.) Sprint will ensure that no more than 30 seconds elapses between the receipt of the dialing information and the dialing of the requested number.

Sprint samples the average answer time a minimum of every 30 minutes for each 24-hour period. Sprint's Traffic Management Control Center (TMCC) and our Enhanced Services Operations Control Center



(ESOCC) are staffed with professionals who understand call processes, call volumes, distribution patterns, contract requirements and call routing, thus ensuring exemplary service.

The Sprint Centers that serve WATRS are provided with sufficient facilities to provide a Grade of Service (GOS) of P.01 or better for calls entering the WATRS call center switch equipment. Inbound calls that may be blocked within the Public Switched Telephone Network (PSTN) will receive a voice recording stating that all circuits are busy and to try the call again within a few minutes.

Performance of inbound traffic on each toll-free number where it enters the Sprint network is measured continuously and reported both daily and monthly. These measurements, which include traffic volume and blockage data, are compiled into a monthly report available to the state. In addition, the dedicated trunk facilities that route the call from the terminating network switch to the Automatic Call Distributor (ACD) at the serving Relay Center are monitored daily for compliance with blockage limitations. This data is monitored for both short and long-term trends to ensure the most cost-effective use of resources.

Sprint also meets requirements for *CapTel* calls. WATRS *CapTel* ensures that 85% of all calls are answered within 10 seconds and that caller's calls are immediately placed. WATRS does not put calls in a queue or on hold. Abandoned calls are included in the speed-of-answer calculation. WATRS *CapTel* system is designed to a P.01 standard or greater measured on a daily basis.

B.3 Equal Access to Interexchange Carriers

Sprint provides WATRS callers with the ability to have their intrastate, interstate and international calls carried by any Interexchange carrier who has agreed to participate in the WATRS Carrier of Choice (COC) program through Sprint. When a caller indicates their COC preference, the CA will verify that the requested carrier is a COC participant and, if they are, the call will be routed accordingly. Callers will be able to use any billing method made available by the requested carrier including collect, third party, prepaid and calling cards.

The current participating members of Sprint Carrier of Choice program are:

- AT&T Communications
- Bell South Long Distance
- Bestline
- Birch Telecom
- Broadwing Communications
- Broadwing Telecommunications
- Cox Communications
- Excel Telecommunications, Inc.
- Global Crossings Telecommunications
- MCIWorldCom
- McLeod USA
- Qwest Communications
- SBC Communications Long Distance
- Souris River Telecommunications
- Sprint
- Telecomm*USA (MCIWorldCom)
- Touch America Services, Inc.



U.S. Link
VarTec dba Clear Choice Communications
VarTec Telecom, Inc.
Verizon Long Distance
Winstar
Working Assets
WorldCom
WorldXChange

If a WATRS caller does not indicate a COC preference to the CA either on-line or in their customer database (or if their preferred carrier is not a COC participant), the call will be carried over the Sprint network. As with calls carried by Sprint, most COC participants limit billing methods based on the type of line from which the call originates.

When the requested carrier is not a COC participant, Sprint has established a procedure where the carrier will be notified, verbally and in writing, of its obligation to provide access to TRS users and encourage their participation.

Please see Appendix E for a sample of the Carrier of Choice letter sent to carriers when a WATRS customer has a preferred interexchange carrier that does not participate in the Sprint COC program.

B.4 TRS Facilities

WATRS and Sprint Relay Customer Service are both available 24 hours a day, 365 days a year. WATRS, through Sprint utilizes both Uninterruptible Power Supply (UPS) and backup power generators to ensure that the Relay Centers have uninterrupted power even in the event of a power outage. The UPS is used only long enough for the backup power generators to come on line in a matter of minutes. The backup power generators are supplied with sufficient fuel to maintain operations for at least 24 hours. The generators can stay in service for longer periods of time as long as fuel is available.

In the event of a power outage, the UPS and backup power generator ensure seamless power transition until normal power is restored. While this transition is in progress, power to all of the basic equipment and facilities essential to the Center's operation is maintained. This includes:

- Switch system and peripherals
- Switch room environmental
- CA positions (consoles/terminals and emergency lights)
- Emergency lights (self-contained batteries)
- System alarms
- Compact Disc Recordable (CDR) recording

As a safety precaution (in case of a fire during a power failure), the fire suppression system is not electrically powered. Once the back-up generator is on line, stable power is established and maintained to all TRS system equipment and facility environmental control until commercial power is restored.



Service Reliability

WATRS, through Sprint's service is provided through an all-fiber sophisticated management control network that support backbone networks with digital switching architecture. These elements are combined to provide a highly reliable, proven, and redundant network. Survivability is a mandatory objective of the Sprint network design. The Sprint network minimizes the adverse effect of service interruptions due to equipment failures or cable cuts, network overload conditions, or regional catastrophes.

A 100 percent fiber-optic network provides critical advantages over the other carriers. These advantages include:

- **Quality**

Since voice and data are transmitted utilizing fiber optic technology, the problems of outdated analog, and even modern microwave transmission, simply do not apply. Noise, electrical interference, weather-impacting conditions, and fading are virtually eliminated.

- **Economy**

The overall quality, architecture, and advanced technology of digital fiber optics make transmission so dependable that it costs us less to maintain, thereby passing the savings on to our customers.

- **Expandability**

As demand for network capacity grows, the capacity of the existing single-mode fiber can grow. Due to the architecture and design of fiber optics, the capacity of the network can be upgraded to increase 2,000-fold.

- **Survivability**

Network survivability is the ability of the network to cope with random disruptions of facilities and/or demand overloads. Sprint has established an objective to provide 100 percent capability to reroute backbone traffic during any single cable cut. This is a significant benefit to Washington State and a competitive differentiation of the Sprint network.

Currently, Sprint has over 23,000 miles of its fiber network in place and in service, with a fiber point of presence (POP) in every Local Access Transport Area (LATA). The 2 LATAs in Washington are served by 10 Sprint POPs. There are plans for additional fiber mileage, additional POPs, and added route diversity. There are more than 300 POPs in service on the network. With 10 POPs in the state, all areas will be adequately serviced by Sprint.

Switched services are provided via 49 Northern Telecom DMS-250/300 switches at 29 locations nationwide. Three DMS-300s located at New York, NY; Fort Worth, TX; and Stockton, CA, serve as international gateways. The remaining 46 switches provide switching functions for Sprint's domestic switched services. Washington would primarily be served by the Digital Multiplex System (DMS) switches in Bellingham, Olympia, Pasco, Seattle, Spokane, Tacoma, and Vancouver, Washington with other diversely located facilities also serving Washington.

Interconnection of the 49 switches is provided in a non-hierarchical manner. This means that inter-machine trunk (IMT) groups connect each switch with all other switches within the network. Each of these IMT groups is split and routed through the Sprint fiber network over SONET route paths for protection and



survivability. As an extra precaution to preclude any call blockage, Dynamically Controlled Routing (DCR) provides an additional layer of tandem routing options when a direct IMT is temporarily busy.

Reliability is ensured through a corporate commitment to maintain or surpass our system objectives. Beginning with the network design, reliability and efficiency are built into the system. WATRS, though Sprint continues to improve the network's reliability through the addition of new technologies.

The effectiveness of this highly reliable and survivable network is attributed to the redundant transmission and switching hardware configurations, SONET ring topology, and sophisticated network management and control Centers. These factors combine to assure outstanding network performance and reliability for Washington.

Network Criteria

System Capacity

The Sprint network was built with the capacity to support every interLATA and intraLATA call available in the US. With the continuing development of network fiber transmission equipment to support higher speeds and larger bandwidth, the capacity of the Sprint network to support increasing customer requirements and technologies is assured well into the future.

Service Restoration

Sprint provides for the restoration of service in the event of equipment malfunctions, isolated network overloads, major network disruptions and national/civil emergency situations. In the event of service disruption due to Sprint's equipment, service typically is restored within four hours after notification. Sprint does everything possible to prevent a total outage at its switch sites or at any of its' POPs through the use of advanced site designs. All processors, memory, and switch networks within our switches are fully redundant. All switch sites are protected by uninterruptible power supplies and halon systems planned in conjunction with local fire departments. Most of our new sites are earth sheltered to increase survivability. A multi-pronged program is used to minimize outages:

1. Do everything possible to minimize the impact of a "single point of failure." This includes:

- Diversification of all facilities' demands between switch sites. All switch sites are connected to the long haul network over at least two separate Sprint fiber routes; many have three paths.
- Deployment of multiple switches at large switching Centers. This prevents a single switch outage from disabling the site.
- Having systems in place allowing for the rapid redeployment of network resources in case of a catastrophic outage. Fiber cuts, which can affect thousands of calls at several locations, are sometimes unavoidable. Response to these outages is maximized through the following procedures:
 - Utilization of established plans to respond effectively to these outages.
 - The capability to rapidly deploy network transmission facilities when needed.



- Immediate execution of alternate routing in the digital switches and cross-connect systems to assist in the handling of temporary network disruptions and forced overloads.

Fiber optic cable routes are designed to include redundant capacity to ensure survivable fiber optic systems. Sprint's SONET network, using four-fiber bi-directional line switched ring capability, allows automatic switching to alternate paths that provide traffic rerouting in the event of a route failure. The SONET fiber optic backbone topology is currently designed with more than 100 overlapping rings to ensure sufficient alternate paths for total network survivability.

Please see Appendix F for Sprint's Route Outage Prevention Programs. Also, please refer to the Disaster Recovery Plan provided in Appendix G for a complete explanation of Sprint's back-up plan.

B.5 Technology

WATRS is in full compliance with 47 CFR §64.1600 et seq. of the FCC's Rules for providing SS7 capability.

Sprint meets all minimum technological standards regarding Video Relay Service (VRS). Sprint VRS is available through www.sprintVRS.com and sprintrelay.tv (for Videophone users).

On July 31, 2006, Sprint launched MySprintVRS number. This MySprintVRS Number feature empowers deaf and hard of hearing Video Relay Service (VRS) users with a simply means of receiving incoming calls. With MySprintVRS Number, a hearing user simply dials one toll free number and quickly reaches an Interpreter who connects them to the Deaf or hard of hearing VRS user without supplying any additional information.

The value of a dedicated personal toll-free number is generally taken for granted. Without a dedicated personal toll-free number, things such as entering a contact number in a department email directory or printing one simple number on a business card are much more complicated. Today telephone numbers are also used as account identifiers or for ordering items. Sprint, unlike most other VRS providers, makes this possible.

For VRS users who have not registered for MySprintVRS, hearing callers may dial a general access toll-free number and provide the video interpreter (VI) with the VRS user's IP Address, or their Sprint VRS Mail extension number.

On October 28, 2006, Sprint also introduced a revolutionary means of wireless access to Sprint VRS mail. As a telecommunications provider, Sprint is uniquely positioned to make retrieval of VRS mail from wireless devices possible from devices with Windows Media Player capability. *Sprint VRS Mail for wireless devices* is extremely popular and empowers VRS users to access and playback VRS message directly from their handset.

In addition to providing SprintIP Relay Services, Sprint is also proud to offer the Deaf and Hard-of-Hearing community with cutting-edge technology using Sprint IP. Using AOL Instant Messenger (AIM®), Sprint IP is capable of blending the easy-to-use capabilities of Sprint IP Relay with the power of wireless devices and equipment that run AIM®. In addition to the ability to place a Relay call over the internet, the wireless user can access Sprint IP on a wireless device with AIM®. This service allows users to access Relay from the park, a restaurant, or even the airport – anywhere a wireless device can access the internet and AIM®.



Sprint also provides *CapTel* services, which is recognized as an enhanced VCO service.

For more information on technology provided through Sprint Relay, please refer to Appendix M: Sprint Relay Fact Sheet.

B.6 Caller ID

In order to achieve functional equivalence for caller ID access, WATRS will continue to provide Caller ID service through SS7 signaling where the 10-digit number of the calling party is passed through to the called-party for local and long-distance calls. WATRS receives calling party identifying information including blocking information, from all Relay users. Sprint's Caller ID SS7 solution includes receiving the privacy bit information from the inbound Relay caller as well as other SS7 call information elements such as:

- Calling Party Number
- Charge Number
- Originating Line Information
- Sprint passes through the calling party information (rather than 711 or the number of the Relay Center)

WATRS Relay offers a network-based Caller ID for all outbound calls which traverse over Sprint's integrated Services Digital Network (ISDN) and SS7 with Sprint's Feature Group D (FGD) network. This feature supports Caller ID for all local and long distance calls. In all cases in which it is received, Sprint forwards the calling party's ANI to the terminating LEC for long-distance calls utilizing Sprint's FGD trunks. As with standard telecommunications, the terminating LEC may or may not choose to use this ANI information as Caller ID information and pass this on to the terminating number. When passed through, the Relay call recipient will be able to see the caller's phone number on their caller ID display (the caller ID option feature must first be purchased through their LEC). When not passed through, as with standard telecommunications, the call recipient will receive a message such as "OUT OF AREA" or "CALLER UNKNOWN."

Functional Standards

C.1 Consumer Complaint Logs

Sprint provides copies of each TRS Customer Contact form, which includes the date the complaint was filed, an explanation of the complaint, the date the complaint was resolved, and explanation of the resolution, and any other pertinent information to Washington. Further, Sprint maintains a log of each individual complaint and provides comprehensive reports on a monthly and annual basis to each of the Sprint States.

By June 15th of each calendar year, Sprint submits a copy of [the](#) 12-month complaint log report for the period of June 1 [through](#) May 31 to the State Relay administrators. WATRS then passes the complaint log to the FCC by July 1st of each year.

C.2 Contact Persons

WATRS callers may file intrastate complaints and commendations regarding WATRS services through the following contacts:



Damara Paris, Relay Program Manager
525 Taggart Rd NW STE# 160, PMB#3
Salem, OR 97304
Customer Service: 1-800-686-3777 (V/TTY)
Customer Service (Spanish) 1-800-676-4290 V/TTY
Fax: 866-403-8096
VP: dparis.mysprint.tv

Steve Peck, TRS Program Manager
1115 Washington St. SE
Olympia, WA 98504-5301
E-mail: pecksc@dshs.wa.gov
TTY: 360-586-8912
Fax: 360-902-0855
V/TTY: 360-902-8000
Toll Free V/TTY: 1-800-422-7930
VP: 360-902-8000

C.3 Public Access to Information

WATRS works closely with the telecommunications industry to ensure that the public is informed about the availability of Relay services available in Washington State. Public information in phone directories contain information about WATRS and phone numbers to reach WATRS services including CapTel and 911 emergency assistance for TTY users. For examples of WATRS telephone directory advertisements, see Appendix O.

WATRS is committed to providing a comprehensive outreach program on all WATRS services. Each year, \$150,000 is designated towards ensuring that specific populations are given information regarding the TRS programs. The Sprint Account Manager and the WATRS Program Manager determine how funds are designated to adequately outreach to Washington Relay users. WATRS also receives input on these outreach endeavors from the legislatively mandated 12 member ODHHS Advisory Committee. The ODHHS Advisory Committee is comprised of deaf, hard of hearing, speech disabled community members, and professionals from hearing and speech related fields.

Some of the more innovative outreach projects created by WATRS include:

- “Don’t Hang Up” campaign: This project was developed in 2005-06 and geared towards businesses, encouraging them not to hang up on WATRS consumers. Businesses unfamiliar with the process of Relay calls often hang up on WATRS consumers thinking that the Relay operators are telemarketers. The theme of the “Don’t Hang Up” campaign emphasizes the possibility of losing business and potential customers who use WATRS to process calls.

In addition, customers who received frequent hang ups from specific businesses were made aware that they could notify the WATRS Relay Program Manager or the Washington WUTC so that the business unfamiliar with Relay services could be contacted for education and training. Other states have adopted this campaign since its inception. See Appendix R for a copy of the “Don’t Hang Up” Post Card.



- Taste of Technology forums: In 2005, Washington was one of the first Relay states to have open, hands-on, forums showing and demonstrating how to use telecommunication technology for people with hearing and speech disabilities. The first forum was held in fall 2005, with just under 100 participants; the second forum was held in the spring of 2007 and had 115 participants. Workshops and booths focusing on WATRS, Sprint Relay, assistive devices for people with disabilities, telecommunication equipment devices and other relevant accessibility topics were provided free of charge to the community.
- CapTel advertisements: Captioned Telephone services, as an enhanced Voice Carry Over service, was introduced to Washington in 2002 on a trial basis until 2003, and became a part of the WATRS contract in 2007. CapTel ads were developed and distributed to hard of hearing community members through Hearing Loss Association of Washington (HLA-WA) which was under an outreach contract with Sprint and Washington Relay to perform outreach services. CapTel ads were also inserted into HLA-WA & ODHH newsletters informing them of the availability of CapTel services in Washington State.
- Educating the speech disabled population: Washington launched an STS campaign in 2001 and 2002 with a speech-language pathologist who provided outreach to other speech-language pathologists and medical facilities to educate consumers and service providers about STS and Hearing Carry Over. WATRS provides STS brochures and is currently in the process of providing STS outreach services through a new contractor to educate speech disabled individuals on the availability of STS Relay services.
- Brochures, printed in English and Spanish, are also available to educate the public about WATRS (see Appendix R). Other examples of public awareness outreach efforts include the ODHH newsletter, and the Community Review, which are published quarterly. WATRS has also developed a website that includes Washington Relay features and relay information at www.washingtonrelay.com. Samples of ODHH newsletters and the Washington Relay Website can be found in Appendix R.

C.4 Rates

WATRS users are charged no more for services than for those charges paid by standard “voice” telephone users. WATRS users, who select Sprint as their interstate carrier, will be rated and invoiced by Sprint. The caller will only be billed for conversation time. Those users, who select a preferred interstate carrier via the WATRS COC list, will be rated and invoiced by the selected interstate carrier.

By FCC jurisdiction, Sprint has two separate Message Telephone Service rates: one for interstate and one for intrastate. The table below exhibits the discounted rates of Sprint’s Message Telephone System (MTS) rates.

	Intrastate	Interstate
Day (7 AM – 6:59 PM)	Use State Specific 35%	50%
Evening (7 PM – 10:59 PM)	Use State Specific 25%	50%
Night/weekend (11 PM – 6:59 AM; all day Saturday & Sunday)	Use State Specific 10%	50%



C.5 Jurisdictional Separation of Costs

All WATRS Relay intrastate and interstate minutes are reported separately and distinctly to the state on the Sprint invoice. The interstate and international minutes are reimbursed by the TRS Interstate Fund. The local and intrastate minutes are reimbursed by the State. On individual state invoices, Sprint deducts minutes that the National Exchange Carrier Association (NECA) would reimburse. These deductible minutes are associated with the following call types: Interstate, International, Interstate Directory Assistance, Toll Free and 900. In accordance with FCC rules, States receive only a 51% deduction for Toll Free and 900 minutes since that is the rate NECA would reimburse. For NECA reimbursement, Sprint uses a cumulative report of eligible customers to calculate its monthly reimbursement request. An invoice and supporting documents are sent monthly to NECA for reimbursement.

WATRS was established by the legislature as a telecommunication program through the Office of the Deaf and Hard of Hearing (ODHH). The premise for establishing WATRS, as well as the Telecommunication Equipment Distribution Program (TED) and the Washington Telephone Assistance Program (WTAP), was the belief that all Washingtonian's have the right to functionally equivalent telephone access, regardless of socioeconomic status, disability or any other barrier to establishing telecommunications access.

As stated under RCW 43.20A.720, WATRS was established as one of the telecommunication programs funded through excise tax. To cover the cost of providing the WATRS program, a telephone line subscriber surcharge is levied on all telephones that could access the Relay service. The surcharge funds covers WATRS expenditures and pays for intrastate calls as well as other expenditures not covered under interstate reimbursement requirements, as established by the National Exchange Carrier Association (NECA).

On each telephone line subscriber's telephone bill under TRS excise funds, there is a line item that states "TRS Excise Funds Federal ADA Requirement at \$0.12 per access line." This informs the public of the purpose of the surcharge tax.

C.6 Complaints

With Sprint, ODHH has established a mechanism for receiving and resolving complaints from WATRS users. Sprint provides a Customer Service toll-free voice and TTY number (800-676-3777) 24 hours a day, 7 days a week, and 365 days a year. Complaints may be submitted in writing, in person, or over the telephone to either Sprint, or the WATRS Program Manager. Most complaints are made during the call are documented and immediately forwarded to the Sprint Account Manager assigned to Washington State to process a resolution with the relay customer. WATRS Relay users have several options for directing their concerns, complaints, or commendations, either during or immediately after the Relay call:

1. Request that the CA contact the Relay supervisor.
2. Contact Sprint Account Manager at 888-655-3514 TTY.
3. Contact the national Sprint Service Center at 800-676-3777 V/TTY.
4. Contact the ODHH at 800-422-7930 (V/TTY), or the WATRS Program Manager at 360-586-8912 (TTY).
5. Submit concerns to the ODHH Advisory Committee.
6. Send an email with concerns to ODHH@dshs.wa.gov or pecksc@dshs.wa.gov



Complaints may also be filed directly with the Federal Communications Commission (FCC) Common Carrier Bureau without initially going through the internal complaint mechanism available in Washington State. All complaints have been resolved within 180 days as required by the FCC.

Procedures & Remedies

Sprint has a comprehensive Customer Complaint Tracking program. An Operations Administrator or Supervisor is available 24 hours a day to accept and document complaints. Supervisors provide immediate feedback to both the customer and the CA, and to forward the documentation to the proper source for resolution.

Sprint provides copies of each TRS Customer Contact form, including the date the complaint was filed, an explanation of the complaint, the date the complaint was resolved and explanation of the resolution and any other pertinent information to WATRS. Further, Sprint maintains a log of each individual complaint and provides comprehensive reports on a monthly and annual basis to the State WATRS Program Manager. The complaint resolution procedure outlines the steps to ensure complaints are resolved within 180 days of filing. If the complaint concerns a specific CA, an Operations Supervisor meets with the CA to follow up with Relay call procedures and resolves the complaint. The role of the supervisor is to:

- Accept all types of complaints, issues and comments
- Handle all service type complaints
- Resolve complaints with CA's
- Follow up with customers if requested by the customers

If the complaint concerns a specific technical issue, a trouble ticket is filed and the ticket number is documented on the customer contact form. The ticket will be investigated and resolved by an on-site technician. The State WATRS Program Manager is responsible for tracking all technical complaints and following up with customers on resolutions.

Sprint has the capability to transfer the caller on-line to the Customer Service department. All calls are answered live by a Customer Service representative. The Sprint Account Manager is responsible for tracking all commendations and complaints and sending copies of Customer Complaints to the WATRS Program Manager by the invoice due date of the following month. To assist customers in identifying contact information for complaints, the toll-free Customer Service number and other contact information is included on all brochures and Outreach materials, including Relay web sites.

Sprint Relay submits all Interstate Relay (Sprint IP, IP Wireless) and Video Relay Service complaints directly to the FCC from June 1-May 31 of each year by the July 1 deadline.

WATRS has adopted the informal FCC procedure of closing all complaints, complete with a satisfactory resolution, within 180 days of the date the complaint was filed with WATRS or Sprint Relay. The State WATRS Program Manager submits all complaints from June 1-May 31 to the FCC by the annual July 1 deadline. To see copies of the WATRS Complaint Log Summaries from 2002 through 2007, please refer to Appendix T.



C.7 Treatment of TRS Customer Info

WATRS, though Sprint's Customer Preference Database features a customer profile that includes such items such as types of call, billing information, speed dialing, slow typing, carrier of choice, as well as emergency numbers, blocked outbound numbers, language type (English, Spanish, ASL) and call notes. At the end of the contract(s) Sprint will transfer all WATRS database records in a usable format to the next incoming Relay provider, at least 60 days prior to the last day of service.

§64.605 State Certification

WATRS has provided Relay services to Washingtonians since 1993. The Legislative mandates, that established rules for the Relay program since 1987, are enclosed as Appendix S. Further evidence of WATRS' commitment to follow the FCC minimum mandatory Relay requirements can also be found in the mandatory items listed most recent RFP, released in 2004. Please refer to Appendix U. WATRS was approved for TRS Certification Renewal by the FCC in 2003. For a copy of this letter, please see Appendix W.

WATRS does not provide Video Relay Services (VRS) or Internet Relay services for the state of Washington. Although there are references to Sprint Relay IP and Sprint Relay VRS services throughout this application, WATRS does not contract to provide these services, nor does WATRS oversee these services for the state of Washington.

WATRS meets or exceeds all requirements mandated for Relay services required by FCC rules, including 47 C.F.R §64.604. WATRS does not provide Relay services or features that conflict or circumvent the FCC rules. Presently, WATRS provides several features through Sprint Relay that exceed the minimum mandatory rules, including but not limited to:

- Carrier of Choice—WATRS exceeds this requirement. Through Sprint Relay, WATRS works with carriers to implement them in the Carrier of Choice (COC) program, even without a request from a Relay user.
- Customized Access Numbers—WATRS provides dedicated 800 numbers (VCO, STS, Spanish Relay, ASCII, Voice, and other access numbers as requested) to assist Relay users who want to access Relay services specifically by their call type. WATRS has had this capability since it first contracted with AT&T in 1992 and continued the WATRS service with Sprint Relay in 1993.
- Two-Line VCO and Reversed Two-Line VCO—WATRS has provided this service since early 2000, allowing consumers to utilize their voice and residual hearing as much as possible.
- E-Turbocode—WATRS contracts with Sprint Relay to provide E-Turbocode, which provides faster transmission of the Relay conversation for Relay users. Sprint Relay is the only Relay provider that has E-Turbocode as part of its TRS standard features package for State Relay contracts. E-Turbocode, exceeds the FCC requirement
- Captioned Telephone services (CapTel)—WATRS provides CapTel as an enhanced VCO service. Because this is not a mandated service, WATRS exceeds this requirement. WATRS has provided this as a service since April 2007.



- Non-shared languages—WATRS provides Spanish to English/English to Spanish to Relay users in need of this service, and therefore exceeds this requirement. WATRS has provided this service since the late 1990's.

In addition, information is available on the Washington Utilities and Transportation Commission (WUTC) website explaining the purpose of the surcharge ([see http://www.wutc.wa.gov/webdocs.nsf/0/963e177d4ca8873c8825645e006768db?OpenDocument](http://www.wutc.wa.gov/webdocs.nsf/0/963e177d4ca8873c8825645e006768db?OpenDocument)). Copies of different phone bill examples showing the surcharge rate are listed under Appendix V.

§64.605(f) Notification of Substantive Change

WATRS has had only two substantive changes in the past five years. The first change was the change in contact persons for WATRS. In summer 2006, Steve Peck was appointed as the TRS Program Manager for the Office of the Deaf and Hard of Hearing (ODHH), which oversees WATRS.

This information was communicated to the FCC by e-mail.

In 2007, *CapTel* became part of the standard contract for WATRS. Please see the notification to the FCC regarding the addition of *CapTel* services in Appendix X.